

Campbell County Cable Board

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To: Federal Communications Commission

I am writing in regard to the FCC's "Notice of Proposed Rulemaking" 05-311 on "video franchising. The Campbell County Cable Board and Community Media Center (Kentucky) are filing these comments. The Campbell County Cable Board was created through an interlocal agreement among 13 cities (Alexandria, Highland Heights, Cold Spring, Bellevue, Wilder, Southgate, Dayton, Woodlawn, Crestview, California, Mentor, Melbourne, and Silver Grove) and the Campbell County Fiscal Court. The Campbell County Cable Board believes that local governments can issue appropriate local franchise for new entrants into the video services field on a timely basis, just as they have for established cable service providers. Franchises ensure that local citizens and communities have control over the telecommunications and media in their area, and that telecommunications companies are accountable to the needs of consumers. Without local franchises local communities will lose the ability to ensure companies charge reasonable rates, respond to customer complaints, or that they provide universal service.

Local video franchises are also the foundation in the operation of Public, Educational, and Governmental (PEG TV). PEG provides a vital service to the Campbell County community. The Campbell County Cable Board and Community Media Center have been running public access in our community since 1999 when we took over from the cable operator. Since that time public access has become a very important and necessary part of the community. The public's right to informed participation in local government, and local community affairs, through public, educational, and governmental media access should not be lightly dismissed. Indeed, the importance of an informed citizenry in government and community affairs is the core of all of our Federal and State Constitutional rights and privileges. PEG plays a vital role in keeping the citizens of Campbell County informed.

Our current franchise began in July 1998 and expires on July 2008. Under the statutory timeline laid out in the Federal Cable Act, the cable operator has a 6-month window beginning 36 months before the expiration of the franchise in which to request a renewal under the Federal Act. As a result, at this time we are currently working on a renewal with the incumbent provider.

The local cable franchising process functions well in Campbell County, Kentucky. We are experienced at working with cable providers to both see that the needs of the local community are met and to ensure that the practical business needs of the cable providers are taken into account.

Local cable franchising ensures that local cable operators are allowed access to rights of way in a fair and evenhanded manner, that other users of the rights of way are not unduly inconvenienced, and that uses the rights of way, including maintenance and upgrade of facilities, are undertaken in a manner which is in accordance with local requirements. Local cable franchising also ensures that our local community's specific needs are met and that local customers are protected.

Local franchises thus provide a means for local government to appropriately oversee the operations of cable service providers in the public interest, and to ensure compliance with applicable laws. There is no need to create a new Federal bureaucracy in Washington to handle matters of specifically local interest.

Local franchises allow each community, including ours, to have a voice in how local cable systems will be implemented and what features (such as PEG access, institutional networks, etc) will be available to meet local needs.

The Campbell County Cable Board and Community Media Center, on behalf of its 14 member jurisdictions, strongly urge the FCC to rule for the maintenance of local franchises.

Respectfully submitted,

The Campbell County Cable Board, Campbell County, Kentucky

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